

U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

MEMO ENDORSED

May 30, 2025

By ECF

Hon. Andrew L. Carter, Jr.
United States Courthouse
40 Foley Square Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: 6/2/2025

Re: *Jordan-Rowell v. United States*, 23 CV 2155 (ALC)

Dear Judge Carter:

In this action, *pro se* plaintiff Janessa Jordan-Rowell seeks a refund of purported income tax overpayments totaling over \$3 million for tax years 2019, 2020, 2021, 2022, 2023 and 2024, as well as additional damages of one billion dollars from the IRS for the disallowance of her administrative refund claims. Recently, Plaintiff amended her complaint to include tax years 2020, 2022, 2023, and 2024.

The Government is preparing a motion for summary judgment based on information contained in Plaintiff's taxpayer file. We write respectfully to request that the due date for the Government's motion be extended by two business days, from May 30 to June 2, 2025.

As explained in our prior request for an extension, the undersigned and agency counsel are working to clarify relevant aspects of Plaintiff's convoluted administrative history. For example, for tax year 2020, Plaintiff has filed 26 tax returns. The Government's motion will include a declaration attaching 67 exhibits. Although the Government and agency counsel have been diligently sifting through this information, we respectfully request the additional time to complete this review, to finalize a declaration from an agency official, and to provide sufficient time for internal review of the motion papers. This is the fourth request for an extension of the filing deadline. The prior requests were granted by orders dated May 7, 21, and 28, 2025.

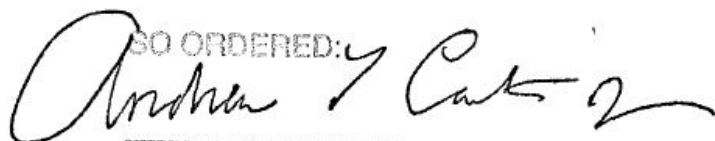
We thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for the United States

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cc: Plaintiff (by regular mail)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

June 2, 2025
New York, New York